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June 28, 2021

VIA ECF

Honorable Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: United States v. Mircea Constantinescu
19-cr-651 (LTS)

Dear Judge Swain:

This letter is submitted on behalf of my client, Mr. Mircea Constantinescu, to respectfully request permission to travel to Tobyhanna, Pennsylvania, with his family from July 2-6, 2021. The address he would stay at is 6533 Laurel Hollow Dr., Tobyhanna, PA 18466.

Both the government and Pretrial Services have been informed of this request. Pretrial Services, through P.T.S.O. Rena Bolin, does not oppose it. To date I have not received a response from the government.

Respectfully submitted,



Meredith S. Heller

Cc: A.U.S.A. Robert B. Sobelman (via ECF)
A.U.S.A. Elizabeth A. Hanft (via ECF)
A.U.S.A. Daniel Loss (via ECF)
P.T.S.O. Rena Bolin (via email)

The Government is directed to file any objection to this request by June 29, 2021, at 12:00 p.m. noon.

SO ORDERED.

6/28/2021

/s/ Laura Taylor Swain, USDJ